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November 18, 2003

BOWLING GREEN, KENTUCKY 42102-0738 NOV 2 2003

PUBLIC STRVICE

COMMISSION

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> Thomas M. Dorman **Executive Director Public Service Commission** P. O. Box 615 211 Sower Blvd. Frankfort, KY 40602

> > IN RE:

Case No. 2002-00042

Investigation into Warren County Water District's

Rate Schedule for Services with Private Fire

Protection Facilities

Dear Mr. Dorman:

Enclosed is the original and 11 copies of a REPLY TO WARREN COUNTY DISTRICT'S RESPONSE TO BARREN RIVER DEVELOPMENT COUNCIL'S MOTION TO INTERVENE, which I would ask that you file of record in the above-referenced matter.

If you would, please file stamp one of these copies, and return it to me in the envelope that I have enclosed for your convenience.

Should you have any questions, please feel free to contact me.

Very truly yours,

TLE/sml Enclosure

Cc: Jack Eversole

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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

NOV 2 0 2003

IN THE MATTER OF:

AN INVESTIGATION INTO WARREN COUNTY)	CASE NO.
WATER DISTRICT'S RATE SCHEDULE FOR)	2002-00042
SERVICES WITH PRIVATE FIRE PROTECTION)	
FACILITIES	ì	

REPLY TO WARREN COUNTY WATER DISTRICT'S RESPONSE TO BARREN RIVER DEVELOPMENT COUNCIL'S MOTION TO INTERVENE

Barren River Development Council ("BRDC"), has moved the Commission to intervene, with full intervention rights. The Warren County Water District has now responded to that motion. BRDC submits this as a Reply to that Response.

Warren County Water District claims that BRDC is not timely. 807 KAR 5:001 Section 3 (8), does not set out a specific timeframe for intervening. This matter is not yet submitted to the Commission for decision, and instead, the Commission is still accepting comments. Only after all the comments are in, the Commission has indicated that it will then allow parties to request a public hearing.

BRDC should be allowed to intervene on a full intervention right basis, not limited intervention. BRDC submits that it is not currently being fully represented by the existing parties to the proceeding. Furthermore, full intervention by BRDC will not result in any additional delay or disrupt the proceedings.

WHEREFORE, Barren River Development Council respectfully requests that it be permitted to intervene in this case, and that it be granted full intervention status.

This <u>19</u> day of November, 2003.

TIMOTHY L. EDELEN
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Attorney for Barren River Development Council

This is to certify that a true and exact copy of the foregoing has this day been mailed to:

John David Cole, Sr. Cole & Moore P. O. Box 10240 Bowling Green, KY 42102-7240

Joe Liles Warren County Water District 523 US Highway 31-W Bypass Bowling Green, KY 42128

David Edward Spenard Assistant Attorney General 1024 Capitol Center Drive Suite 200 Frankfort, KY 40601-8204

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Dixie R. Satterfield Satterfield Law Office P. O. Box 9970 Bowling Green, KY 42102-9970

This 19 day of November, 2003.

Attorney for Barren River Development Council